



**WIPO Arbitration and Mediation Centre Decisions Referred to in Complaint**

3. Attached to this Declaration and marked as **Exhibit “A.”** is a copy of the WIPO Arbitration and Mediation Center decision dated October 20, 2023 and referred to in paragraph 37 of the Complaint.

4. Attached to this Declaration and marked as **Exhibit “B.”** is a copy of the WIPO Arbitration and Mediation Center decision dated April 9, 2024 and referred to in paragraph 38 of the Complaint.

**Documents from VSCO’s DMCA Subpoena Request Court File**

5. Attached to this Declaration and marked as **Exhibit “C.”** is a document entitled “VISUAL SUPPLY COMPANY’S REQUEST TO THE CLERK FOR ISSUANCE OF SUBPOENAS PURSUANT TO SECTION 512(h) TO IDENTIFY ALLEGED INFRINGERS” that is filed as Docket #2 in Court File 3:24-mc-80159-SK.

6. Attached to this Declaration and marked as **Exhibit “D.”** is a document entitled “DECLARATION OF ANDREW M. LEVAD IN SUPPORT OF VISUAL SUPPLY COMPANY’S REQUEST TO THE CLERK FOR ISSUANCE OF SUBPOENAS PURSUANT TO SECTION 512(h) TO IDENTIFY ALLEGED INFRINGERS” that is filed as Docket #2-1 in Court File 3:24-mc-80159-SK.

7. Attached to this Declaration and marked as **Exhibit “E.”** is a letter with the subject line “Application for DMCA Subpoenas to Service Providers” that is filed as Docket #2-2 in Court File 3:24-mc-80159-SK.

**Internet Protocol (IP) Address in the Files Provided by VSCO**

8. In Mr. Adam Khimji's declaration filed for this motion, Exhibit D at page 25 shows three email attachments. In the first attachment entitled "vsco.club...", there is reference to an IP address at 184.147.76.101.

9. Attached to this Declaration and marked as **Exhibit "F."** is a printout of the geolocations for the 184.147.76.101 address, printed from <https://www.iplocation.net/ip-lookup>.

10. According to Exhibit F, the 184.147.76.101 address is associated with the following three Canadian cities:

- a. Kingsville, Ontario
- b. Leamington, Ontario
- c. Amherstburg, Ontario

11. Attached to this Declaration and marked as **Exhibit "G."** is a printout from Google Maps showing the distance between Kingsville, Ontario and Ottawa, Ontario, where Mr. Khimji resides, is approximately 464 miles.

12. Attached to this Declaration and marked as **Exhibit "H."** is a printout from Google Maps showing the distance between Leamington, Ontario and Ottawa, Ontario, where Mr. Khimji resides, is approximately 487 miles.

13. Attached to this Declaration and marked as **Exhibit "I."** is a printout from Google Maps showing the distance between Amherstburg, Ontario and Ottawa, Ontario, where Mr. Khimji resides, is approximately 478 miles.

**Correspondences between Mr. Khimji's Current Counsel and VSCO's Counsel**

14. Attached to this Declaration and marked as **Exhibit "J."** is a letter from the undersigned to VSCO's counsel on March 13, 2025 requesting documents relating to the two WIPO Arbitration and Mediation Center cases referred to in paragraphs 37-38 of the Complaint.

15. Attached to this Declaration and marked as **Exhibit "K."** is an email from VSCO's counsel on March 14, 2025 refusing to provide the requested documents.

16. Attached to this Declaration and marked as **Exhibit "L."** is an email to VSCO's counsel on March 14, 2025 specifically bringing to their attention that the IP address 184.147.76.101 is registered to a physical location about 800 kilometers away from where Mr. Khimji resides, and inquired whether VSCO has made any inquiries with the Canadian internet service provider using that IP address.

17. Attached to this Declaration and marked as **Exhibit "M."** is an email from VSCO's counsel on March 14, 2025 stating "[a]s for the discovery issues, I'll discuss further with VSCO" but did not answer the undersigned's inquiry on whether VSCO made any inquiries on the IP address above.

18. Attached to this Declaration and marked as **Exhibit "N."** is an email to VSCO's counsel on March 14, 2025 stating as follows:

Can you please point me to the correspondences where you say Mr. Khimji "*refused to identify the owners/operators of the other sites identified in the Complaint*"? The manner Mr. Kleiman handling this file leaves much to be desired, and he is no longer involved. I trust that my involvement here could bring a fresh perspective.

Thank you for agreeing to speak with your client about the exchange of information. The reason I ask about the IP address is, it appears from the exchanges that the Plaintiff may have overlooked the possibility that a third-party may have utilized Mr. Khimji's name without permission. It



1 would seem to make little sense for someone to use a Protonmail email  
2 account (which is regarded as highly anonymous) only to then use their  
3 real name with an internet company such as Cloudflare.

4 19. As of the date of signing this Declaration, VSCO's counsel has not  
5 responded to the aforementioned email in Exhibit N.

6 I declare under penalty of perjury under the laws of the State of California that  
7 the foregoing is true and correct.

8 Executed on March 21, 2025 in the City of Coquitlam, Province of British  
9 Columbia, Canada.

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# EXHIBIT A

ARBITRATION  
AND  
MEDIATION CENTER



## **ADMINISTRATIVE PANEL DECISION**

Visual Supply Company (“VSCO”) v. Nice IT Services Group Inc., Customer Domain Admin and Aiden Salamon  
Case No. D2023-3616

### **1. The Parties**

The Complainant is Visual Supply Company (“VSCO”), United States of America (“United States”), represented by Sideman & Bancroft LLP, United States.

The Respondents are Nice IT Services Group Inc., Customer Domain Admin, Dominica, and Aiden Salamon, Canada.

### **2. The Domain Names and Registrars**

The disputed domain name <vsco.club> is registered with NameCheap, Inc.; and the disputed domain name <vsco.page> is registered with NameSilo, LLC (collectively, the “Registrar(s)”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 29, 2023. On August 29, 2023, the Center transmitted by email to the Registrars requests for registrar verification in connection with the disputed domain names. On August 29, 2023, the Registrars transmitted by email to the Center verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Registrant Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 1, 2023, providing the registrant and contact information disclosed by the Registrars, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on September 6, 2023.

The Center sent an email communication to the Complainant on September 1, 2023, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity. The Complainant filed an amended Complaint on September 6, 2023.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the “Policy” or “UDRP”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the “Supplemental Rules”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceeding commenced on September 7, 2023. In accordance with the Rules, paragraph 5, the due date for Response was September 27, 2023. The Respondent Aiden Salamon sent email communications to the Center on September 7 and 14, 2023 in respect of the disputed domain name <vsco.club>. The Center notified the commencement of Panel appointment to the Parties on September 28, 2023.

The Center appointed Sebastian M.W. Hughes as the sole panelist in this matter on October 6, 2023. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

#### **4. Factual Background**

##### **A. Complainant**

The Complainant is a company founded in 2011 and headquartered in the United States. The Complainant provides its downloadable photo and video editing products under the trade mark VSCO (the “Trade Mark”), via its website and via mobile apps.

The Complainant is the owner of numerous registrations for the Trade Mark, including United States registration No. 4273434 for the device Trade Mark, registered on January 8, 2013.

##### **B. Respondents**

The Respondent Nice IT Services Group Inc., Customer Domain Admin is located in Dominica.

The Respondent Aiden Salamon is located in Canada.

##### **C. The Disputed Domain Names**

The disputed domain name <vsco.page> was registered on July 19, 2019

The disputed domain name <vsco.club> was registered on December 10, 2021.

##### **D. Use of the Disputed Domain Names**

The disputed domain name <vsco.page> is resolved to an English language website, featuring photographs taken from the Complainant’s website, apparently offering downloads of the Complainant’s products, and also containing links to unrelated third party websites (the “vsco.page Website”).

The disputed domain name <vsco.club> was previously resolved to an English language website under the name “Glizzy Café”, containing food related postings, featuring photographs taken from the Complainant’s website, apparently offering downloads of the Complainant’s products, and also containing links to unrelated third party websites (the “vsco.club Website”). It was subsequently resolved to a Thai language website apparently promoting the Taco Bell Mexican food chain in Thailand.

## 5. Parties' Contentions

### A. Complainant

The Complainant contends that the disputed domain names are identical or confusingly similar to the Trade Mark; the Respondents have no rights or legitimate interests in respect of the disputed domain names; and the disputed domain names have been registered and are being used in bad faith.

### B. Respondents

The Respondent Nice IT Services Group Inc., Customer Domain Admin did not reply to the Complainant's contentions.

The Respondent Aiden Salamon sent an informal email communications to the Center with respect to the disputed domain name <vsco.club> and contended that he is unrelated to the Respondent Nice IT Services Group Inc., Customer Domain Admin; that he does not own the disputed domain name <vsco.page>; and that he has ceased using the disputed domain name <vsco.club>.

## 6. Discussion and Findings

### 6.1. Preliminary Issue: Consolidation of Respondents

Section 4.11.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)) provides as follows:

"Where a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties. Procedural efficiency would also underpin panel consideration of such a consolidation scenario."

The Complainant contends that there should be consolidation of the Respondents in the present proceeding, for the following reasons:

- (i) the disputed domain names were initially registered through the same Registrar, NameCheap, Inc.;
- (ii) the domain name <glizzy.cafe> to which the disputed domain name <vsco.club> resolved is also registered through NameCheap, Inc.;
- (iii) the disputed domain names resolved to websites that were visually the same and were substantially identical in layout, each of which impersonated the Complainant's website;
- (iv) the disputed domain names resolved to websites using nearly identical text, for example, "change <https://vsco.co> to <https://vsco.page> for quick access"; and "change <https://vsco.co> to <https://glizzy.cafe> for quick downloads."; "VSCO Downloader & Viewer, download/view HD versions of VSCO pictures and videos" and "VSCO Downloader and VSCO Viewer! Download HD full size VSCO media and profile photos and videos"; and
- (v) when the Complainant first reported the disputed domain name <vsco.page> to the Registrar for trademark infringement on May 17, 2023, comments were posted on the Patreon account "VSCO.CLUB" available at "[www.patreon.com/vscoclub](http://www.patreon.com/vscoclub)", namely statements that there was "bad news" on May 18, 2023, a "vsco lawyer saga" on June 3, 2023, and a "new website" was created on June 20, 2023. The Respondent promoted the "VSCO.CLUB" Patreon account on the vsco.club Website.

The Respondent Aiden Salamon contended that:

- (i) he does not own or control the vsco.page Website, he does not know who owns that platform, nor did he ever have any business relationship with them;
- (ii) the websites for the disputed domain names are registered using different registrars, and hosting providers;
- (iii) the contact person on file for both of the websites are not only different, but also have different email addresses. Even when visiting both websites, they have different contact email addresses;
- (iv) if the vsco.club Website was operated by the same person as the vsco.page Website, why would the vsco.club Website shut down but the vsco.page Website continue to operate?;
- (v) after receiving a letter of demand from the Complainant's lawyers, he forwarded the disputed domain name <vsco.club> to a website promoting Taco Bell in Thailand.

For the above reasons put forward by the Complainant, the Panel concludes that there are sufficient grounds to support the conclusion that the disputed domain names are subject to common control and that consolidation would be fair and equitable to all Parties. In particular, the postings on the "VSCO.CLUB" Patreon account immediately after the Complainant's lawyers had reported the <vsco.page> to the Registrar cannot be coincidence and demonstrate common ownership.

In all the circumstances, the Panel does not find the email communications sent on behalf of the Respondent Aiden Salamon convincing.

Save where the context suggests otherwise, the Respondents will accordingly be referred to as the "Respondent" hereinafter.

## **6.2 Substantive Elements of the Policy**

The Complainant must prove each of the three elements in paragraph 4(a) of the Policy in order to prevail.

### **A. Identical or Confusingly Similar**

The Panel finds that the Complainant has rights in the Trade Mark.

Disregarding the generic Top-Level Domains, each of the disputed domain names is identical to the Trade Mark.

The Panel therefore finds that the disputed domain names are identical to the Trade Mark.

### **B. Rights or Legitimate Interests**

Paragraph 4(c) of the Policy provides a list of non-exhaustive circumstances any of which is sufficient to demonstrate that a respondent has rights or legitimate interests in a disputed domain name:

- (i) before any notice to the respondent of the dispute, the respondent's use of, or demonstrable preparations to use, the disputed domain name or a name corresponding to the disputed domain name in connection with a *bona fide* offering of goods or services; or
- (ii) the respondent (as an individual, business, or other organization) has been commonly known by the disputed domain name even if the respondent has acquired no trade mark or service mark rights; or

- (iii) the respondent is making a legitimate noncommercial or fair use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trade mark or service mark at issue.

The Complainant has not authorised, licensed, or permitted the Respondent to register or use the disputed domain names or to use the Trade Mark. The Panel finds on the record that there is therefore a *prima facie* case that the Respondent has no rights or legitimate interests in the disputed domain names, and the burden of production is thus on the Respondent to produce evidence to rebut this presumption.

The Respondent has failed to show that he has acquired any trade mark rights in respect of the disputed domain names or that the disputed domain names have been used in connection with a *bona fide* offering of goods or services. To the contrary, the disputed domain names have been used in respect of the vsco.page Website and the vsco.club Website, featuring photographs taken from the Complainant's website, apparently offering downloads of the Complainant's products, and also containing links to unrelated third party websites; and in addition the disputed domain name <vsco.club> has been resolved, for commercial gain, to a website promoting Taco Bell in Thailand.

There has been no evidence adduced to show that the Respondent has been commonly known by the disputed domain names; and there has been no evidence adduced to show that the Respondent is making a legitimate noncommercial or fair use of the disputed domain names.

In addition, the nature of the disputed domain names (which is identical to the Complainant's Trade Mark) carries a high risk of implied affiliation with the Complainant (see [WIPO Overview 3.0](#), section 2.5.1).

The Panel finds that the Respondent has failed to produce any evidence to rebut the Complainant's *prima facie* case that the Respondent lacks rights or legitimate interests in the disputed domain names. The Panel therefore finds that the Respondent lacks rights or legitimate interests in the disputed domain names.

### **C. Registered and Used in Bad Faith**

In light of the manner of use of the disputed domain names highlighted in section 6.2.B above, the Panel concludes that the disputed domain names have been registered and used in bad faith pursuant to paragraph 4(b)(iv) of the Policy.

The evidence suggests that the Respondent has targeted the Complainant in registering the disputed domain names; and that there cannot be any actual or contemplated good faith use of the inherently misleading disputed domain names by the Respondent.

### **7. Decision**

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain names <vsco.page> and <vsco.club> be transferred to the Complainant.

/Sebastian M.W. Hughes/

**Sebastian M.W. Hughes**

Sole Panelist

Dated: October 20, 2023

# EXHIBIT B



ARBITRATION  
AND  
MEDIATION CENTER



## **ADMINISTRATIVE PANEL DECISION**

Visual Supply Company (“VSCO”) v. Nice IT Services Group Inc., Customer Domain Admin

Case No. D2024-0621

### **1. The Parties**

The Complainant is Visual Supply Company (“VSCO”), United States of America (“United States”), represented by Sideman & Bancroft LLP, United States.

The Respondent is Nice IT Services Group Inc., Customer Domain Admin, Dominica.

### **2. The Domain Name and Registrar**

The disputed domain name <vsco.top> is registered with NameSilo, LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 10, 2024. On February 12, 2024, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 12, 2024, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Registrant Unknown, PrivacyGuardian.org llc) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 14, 2024, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on February 17, 2024.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the “Policy” or “UDRP”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the “Supplemental Rules”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on February 21, 2024. In accordance with the Rules, paragraph 5, the due date for Response was March 12, 2024. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 14, 2024.

The Center appointed Steven A. Maier as the sole panelist in this matter on March 20, 2024. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

#### **4. Factual Background**

The Complainant is a United States corporation. It is the provider of a photo and video editing app and related website and operates an online community for its users.

The Complainant is the owner of various registrations for the trademark VSCO, including (for example) United States trademark registration number 4672062 for the word mark VSCO, registered on January 13, 2015, in International Class 42.

The Complainant operates a website at "www.vSCO.co". The website includes content created by the Complainant's community members.

The disputed domain name was registered on June 11, 2023.

The Complainant provides evidence that the disputed domain name has resolved to a website at "www.vSCO.top". The website appears to reference the Complainant's app and services and includes a box marked "VSCO username" and a button marked "Download". It also includes the statement "vSCO.top provides an alternative way to view media hosted by vSCO.co." The website includes sections headed "Quick Facts" and "Disclaimer" which state respectively that "vSCO.top is in no way affiliated with vSCO.co," and that "[o]ur role is to offer an alternative way to access and view content from vSCO.co."

#### **5. Parties' Contentions**

##### **A. Complainant**

The Complainant submits that it launched its first mobile app in 2012 and offers its products for download through its own website, the Google Play Store and the Apple App Store. It states that it has amassed over 150 million Android and iPhone downloads to date, and that its VSCO trademark has therefore acquired significant customer recognition and goodwill.

The Complainant submits that the disputed domain name is identical to its VSCO trademark.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that it has no relationship with the Respondent and has never authorized it to use its VSCO trademark, that the Respondent has not commonly been known by the disputed domain name and that the Respondent is making neither bona fide commercial use nor legitimate noncommercial or fair use of the disputed domain name.

The Complainant contends that instead, the Respondent has used the disputed domain name to host a website which closely imitates the Complainant's own website and duplicates images and user profiles taken from that website. The Complainant submits that the Respondent's website also offers links to user profiles and images on the Complainant's website, and has bypassed technological protection that the Complainant has put in place to prevent such images from being downloaded.

The Complainant contends that the Respondent's use of the disputed domain name to impersonate the Complainant cannot give rise to rights or legitimate interests in respect of the disputed domain name.

The Complainant submits that the disputed domain name was registered and has been used in bad faith. It contends that the Respondent is taking unfair advantage of its VSCO trademark and, in particular, has used the disputed domain name to lure potential and current users of the Complainant's services to the Respondent's website, to confuse such users, and to unduly profit from the Complainant's reputation. The Complainant adds that the Respondent's providing access to profiles and images taken from the Complainant's legitimate website also tarnishes the Complainant's reputation.

## **B. Respondent**

The Respondent did not reply to the Complainant's contentions.

## **6. Discussion and Findings**

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

### **A. Identical or Confusingly Similar**

The Complainant has established that it has registered trademark rights in respect of the mark VSCO. The disputed domain name is identical to that trademark and the Panel therefore finds that the disputed domain name is identical to a trademark in which the Complainant has rights.

### **B. Rights or Legitimate Interests**

The Respondent purports to offer an alternative method of accessing and viewing the Complainant's content. However, the Panel finds that the Respondent has done so dishonestly. First, the disputed domain name constitutes a direct appropriation of the Complainant's VSCO trademark, without any addition which might indicate the Respondent's lack of affiliation with the Complainant. The use of a domain name which is identical to a complainant's trademark carries "a high risk of implied affiliation" with that trademark (see section 2.5.1 of WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)") and the Panel finds that Internet users are likely to be confused, by the disputed domain name itself, into believing that the Respondent's website is affiliated with or duly authorized by the Complainant. The Respondent is in a position to gain a commercial advantage as soon as Internet users visit its website on the basis of such confusion, and the Panel finds the Respondent's disclaimer to be ineffective to prevent that consequence. Moreover, the Panel finds that the Respondent has copied and provided access to materials taken from the Complainant's website, which may implicate both intellectual property and security concerns.

In the circumstances described above, the Respondent's use of the disputed domain name to provide access to the Complainant's content is neither bona fide nor legitimate and the Panel finds that the Respondent has no rights or legitimate interests in respect of the disputed domain name.

### **C. Registered and Used in Bad Faith**

The Panel's conclusions in respect of the third element under the Policy are informed by similar considerations as set out above. The Panel finds the disputed domain name to be inherently misleading, and that both the use of the disputed domain name and the Respondent's website content take unfair

advantage of the Complainant's trademark rights. The Panel accepts the Complainant's submissions that the Respondent's conduct with regard to the Complainant's user content is liable to tarnish the Complainant's reputation, in addition to providing an unfair commercial advantage to the Respondent.

The Panel finds in particular that, by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation, or endorsement of its website or of a product or service on its website (paragraph 4(b)(iv) of the Policy).

The Panel finds in the circumstances that the disputed domain name has been registered and is being used in bad faith.

## **7. Decision**

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain name <vsco.top> be transferred to the Complainant.

*/Steven A. Maier/*

**Steven A. Maier**

Sole Panelist

Date: April 3, 2024

# EXHIBIT C

1 ERICA BRAND PORTNOY (State Bar No. 244923)

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VISUAL SUPPLY COMPANY

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**UNITED STATES DISTRICT COURT**

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**NORTHERN DISTRICT OF CALIFORNIA**

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**SAN FRANCISCO DIVISION**

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IN RE: DMCA SECTION 512(h)  
SUBPOENA TO (1) CLOUDFLARE,  
14 INC.; (2) PATREON, INC.; and (3)  
15 NAMESILO, L.L.C.

16

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Case No. \_\_\_\_\_

**VISUAL SUPPLY COMPANY'S  
REQUEST TO THE CLERK FOR  
ISSUANCE OF SUBPOENAS PURSUANT  
TO SECTION 512(h) TO IDENTIFY  
ALLEGED INFRINGERS**

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LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711

Petitioner VISUAL SUPPLY COMPANY (“VSCO”), by and through its undersigned counsel of record, hereby requests that the Clerk of the Court issue subpoenas directed to Cloudflare, Inc. (“Cloudflare”), Patreon, Inc. (“Patreon”) and NameSilo, L.L.C. (“NameSilo”) (collectively, the “Service Providers”) to identify an alleged infringer or infringers behind several internet listings, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “Subpoenas”).

The Subpoenas relate to infringing content that VSCO has determined violates its, or its users’, intellectual property rights hosted by the Service Providers, or relating to other services provided by the Service Providers related to the infringing content. The infringing content includes, without limitation, unauthorized reproductions of copyrighted images for which VSCO has the authority to enforce the copyrights on behalf of its user community.

VSCO has satisfied the requirements for issuance of the Subpoenas pursuant to 17 U.S.C. § 512(h), in that it has:

(1) Submitted a copy of a notification required by 17 U.S.C. § 512(c)(3)(A) to each of the Service Providers for each of the identified listings. *See* Declaration of Andrew M. Levad in support of this Request, submitted concurrently herewith (the “Levad Decl.”), ¶¶ 3-9 and Exhibits A-F.

(2) Submitted proposed Subpoenas concurrently herewith. *See Exhibits A-C* to this Request.

(3) Submitted a sworn declaration confirming that the purpose for which the Subpoenas are sought is to obtain the identity of the alleged infringers and that such information will only be used for the purpose of protecting VSCO’s rights under 17 U.S.C. § 512(h)(2). *See* Levad Decl., ¶ 9.

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1 Because VSCO has complied with the statutory requirements, VSCO respectfully requests  
2 that the Clerk of the Court expeditiously issue and sign the proposed Subpoenas pursuant to 17  
3 U.S.C. § 512(h)(4) and return them to undersigned counsel for service on the subpoena recipients.

4  
5 DATED: June 26, 2024

Respectfully submitted,

6 SIDEMAN & BANCROFT LLP

7 By: /s/ Andrew M. Levad

8 Andrew M. Levad

9 Attorneys for Visual Supply Company

LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711



# EXHIBIT A

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff*

v.

\_\_\_\_\_  
*Defendant*)  
)  
)  
)  
)  
)

Civil Action No. \_\_\_\_\_

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

\_\_\_\_\_  
*(Name of person to whom this subpoena is directed)*

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:	Date and Time:
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*\_\_\_\_\_  
*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* \_\_\_\_\_, who issues or requests this subpoena, are:

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

1                   **ATTACHMENT A TO SECTION 512(h) SUBPOENA TO CLOUDFLARE, INC.**

2                   **DEFINITIONS**

3           A.       “PERSON(S)” includes any natural person, firm, association, organization,  
4 partnership, business, trust, corporation, governmental or public entity or any other form of legal  
5 entity.

6           B.       “DOCUMENT” or “DOCUMENTS” shall mean all documents, including all  
7 communications, electronically stored information, and tangible things as described in Rule 34 of  
8 the Federal Rules of Civil Procedure.

9           C.       “RELATING TO,” “RELATED TO” or “RELATE(S) TO” means constituting,  
10 containing, concerning, embodying, reflecting, identifying, stating, mentioning, discussing,  
11 describing, evidencing, or in any other way being relevant to that given subject matter.

12           D.       “YOU” and “YOUR” shall mean and refer to that Delaware corporation Cloudflare,  
13 Inc. and any of its officers, employees, agents, managers, or other authorized individuals able to  
14 act on its behalf.

15           E.       “ALL” shall be understood to include and encompass “any,” and “any” shall be  
16 understood to include and encompass “all.”

17                   **INSTRUCTIONS**

18           1.       To the extent possible through reasonable effort, please: (1) produce all of the  
19 specified DOCUMENTS as a portable document file (*i.e.*, PDF) format, or where only information  
20 is provided, please provide the information in a spreadsheet (*i.e.* Excel) format. If any  
21 DOCUMENT cannot reasonably be produced in PDF or spreadsheet format, please contact  
22 counsel for Petitioner prior to production for additional instruction.

23           2.       Whenever possible, the singular form of a word shall be interpreted in the plural  
24 and vice versa; verb tenses shall be interpreted to include past, present, and future tenses; the terms  
25 “and” as well as “or” shall be construed either conjunctively or disjunctively, as necessary, to  
26 bring within the scope of these requests any DOCUMENTS or information that might otherwise  
27 be considered outside their purview.

1           3.       If an objection is made to part or all of any request, the part should be specified  
2 together with the reasons for the objection, and include a sufficient level of particularity to address  
3 the objection, whether it be based on privilege, immunity, or otherwise.

4           4.       If YOU do not have DOCUMENTS or information responsive to ANY or ALL of  
5 the following requests for production, please state so in YOUR response and provide the reason  
6 why such DOCUMENTS cannot be produced.

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LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711

## **REQUESTS FOR PRODUCTION**

1. DOCUMENTS sufficient to identify the operator(s) and/or owner(s) of the website <https://www.downloader.se/>, for which YOU provided network service solutions, including, but not limited, to pass-through security services, content distribution network, web hosting services, and/or domain registrar services, including DOCUMENTS sufficient to identify: (1) the name of the individual owner(s) and/or operator(s) of the website (and, if a corporation or other business entity, its principals, officers, and employees); (2) the owner and/or operators' last known address(es); (3) last known telephone number(s); (4) any electronic mail addresses associated with the account; and (5) any logs of IP addresses used to access the subject account from January 2023 to the present.

2. DOCUMENTS sufficient to identify the operator(s) and/or owner(s) of the website <https://www.vSCO.top/>, for which YOU provided network service solutions, including, but not limited, to pass-through security services, content distribution network, web hosting services, and/or domain registrar services, including DOCUMENTS sufficient to identify: (1) the name of the individual owner(s) and/or operator(s) of the website (and, if a corporation or other business entity, its principals, officers, and employees); (2) the owner and/or operators' last known address(es); (3) last known telephone number(s); (4) any electronic mail addresses associated with the account; and (5) any logs of IP addresses used to access the subject account from January 2023 to the present.

3. DOCUMENTS sufficient to identify the operator(s) and/or owner(s) of the website <https://www.vSCO.page/>, for which YOU provided network service solutions, including, but not limited, to pass-through security services, content distribution network, web hosting services, and/or domain registrar services, including DOCUMENTS sufficient to identify: (1) the name of the individual owner(s) and/or operator(s) of the website (and, if a corporation or other business entity, its principals, officers, and employees); (2) the owner and/or operators' last known address(es); (3) last known telephone number(s); (4) any electronic mail addresses associated with the account; and (5) any logs of IP addresses used to access the subject account from January 2023 to the present.

1           4.       DOCUMENTS sufficient to identify the operator(s) and/or owner(s) of the website  
2       <https://www.glizzy.cafe/>, for which YOU provided network service solutions, including, but not  
3       limited, to pass-through security services, content distribution network, web hosting services,  
4       and/or domain registrar services, including DOCUMENTS sufficient to identify: (1) the name of  
5       the individual owner(s) and/or operator(s) of the website (and, if a corporation or other business  
6       entity, its principals, officers, and employees); (2) the owner and/or operators' last known  
7       address(es); (3) last known telephone number(s); (4) any electronic mail addresses associated with  
8       the account; and (5) any logs of IP addresses used to access the subject account from January 2023  
9       to the present.

LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711



# EXHIBIT A

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff*

v.

\_\_\_\_\_  
*Defendant*)  
)  
)  
)  
)  
)

Civil Action No. \_\_\_\_\_

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

\_\_\_\_\_  
*(Name of person to whom this subpoena is directed)*

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:	Date and Time:
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*\_\_\_\_\_  
*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* \_\_\_\_\_, who issues or requests this subpoena, are:

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A TO SECTION 512(h) SUBPOENA TO PATREON, INC.**

**DEFINITIONS**

A. “PERSON(S)” includes any natural person, firm, association, organization, partnership, business, trust, corporation, governmental or public entity or any other form of legal entity.

B. “DOCUMENT” or “DOCUMENTS” shall mean all documents, including all communications, electronically stored information, and tangible things as described in Rule 34 of the Federal Rules of Civil Procedure.

C. “RELATING TO,” “RELATED TO” or “RELATE(S) TO” means constituting, containing, concerning, embodying, reflecting, identifying, stating, mentioning, discussing, describing, evidencing, or in any other way being relevant to that given subject matter.

D. “YOU” and “YOUR” shall mean and refer to that Delaware corporation Patreon, Inc. and any of its officers, employees, agents, managers, or other authorized individuals able to act on its behalf.

E. “ALL” shall be understood to include and encompass “any,” and “any” shall be understood to include and encompass “all.”

**INSTRUCTIONS**

1. To the extent possible through reasonable effort, please: (1) produce all of the specified DOCUMENTS as a portable document file (*i.e.*, PDF) format, or where only information is provided, please provide the information in a spreadsheet (*i.e.* Excel) format. If any DOCUMENT cannot reasonably be produced in PDF or spreadsheet format, please contact counsel for Petitioner prior to production for additional instruction.

2. Whenever possible, the singular form of a word shall be interpreted in the plural and vice versa; verb tenses shall be interpreted to include past, present, and future tenses; the terms “and” as well as “or” shall be construed either conjunctively or disjunctively, as necessary, to bring within the scope of these requests any DOCUMENTS or information that might otherwise be considered outside their purview.

1           3.       If an objection is made to part or all of any request, the part should be specified  
2 together with the reasons for the objection, and include a sufficient level of particularity to address  
3 the objection, whether it be based on privilege, immunity, or otherwise.

4           4.       If YOU do not have DOCUMENTS or information responsive to ANY or ALL of  
5 the following requests for production, please state so in YOUR response and provide the reason  
6 why such DOCUMENTS cannot be produced.

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**SIDEMAN & BANCROFT LLP**  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711

**REQUESTS FOR PRODUCTION**

1  
2 1. DOCUMENTS sufficient to identify the operator(s) and/or owner(s) of the Patreon  
3 account “VSCO.CLUB” with a website formerly located at <https://www.patreon.com/vscoclub/>,  
4 for which YOU provided account or network services, including, but not limited, content  
5 distribution network, web hosting services, and/or content hosting services, including  
6 DOCUMENTS sufficient to identify: (1) the name of the individual owner(s) and/or operator(s) of  
7 the account (and, if a corporation or other business entity, its principals, officers, and employees);  
8 (2) the owner and/or operators’ last known address(es); (3) last known telephone number(s); (4)  
9 any electronic mail addresses associated with the account; and (5) any logs of IP addresses used to  
10 access the subject account from January 2023 to the present.  
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# EXHIBIT C



## UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_\_  
*Plaintiff*

v.

\_\_\_\_\_  
*Defendant*)  
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)

Civil Action No. \_\_\_\_\_

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

\_\_\_\_\_  
(Name of person to whom this subpoena is directed)

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:

Date and Time:

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*\_\_\_\_\_  
*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_  
\_\_\_\_\_, who issues or requests this subpoena, are:

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A TO SECTION 512(h) SUBPOENA TO NAMESILO, L.L.C.****DEFINITIONS**

A. “PERSON(S)” includes any natural person, firm, association, organization, partnership, business, trust, corporation, governmental or public entity or any other form of legal entity.

B. “DOCUMENT” or “DOCUMENTS” shall mean all documents, including all communications, electronically stored information, and tangible things as described in Rule 34 of the Federal Rules of Civil Procedure.

C. “RELATING TO,” “RELATED TO” or “RELATE(S) TO” means constituting, containing, concerning, embodying, reflecting, identifying, stating, mentioning, discussing, describing, evidencing, or in any other way being relevant to that given subject matter.

D. “YOU” and “YOUR” shall mean and refer to that Arizona limited liability company NameSilo, L.L.C. and any of its officers, employees, agents, managers, or other authorized individuals able to act on its behalf.

E. “ALL” shall be understood to include and encompass “any,” and “any” shall be understood to include and encompass “all.”

**INSTRUCTIONS**

1. To the extent possible through reasonable effort, please: (1) produce all of the specified DOCUMENTS as a portable document file (*i.e.*, PDF) format, or where only information is provided, please provide the information in a spreadsheet (*i.e.* Excel) format. If any DOCUMENT cannot reasonably be produced in PDF or spreadsheet format, please contact counsel for Petitioner prior to production for additional instruction.

2. Whenever possible, the singular form of a word shall be interpreted in the plural and vice versa; verb tenses shall be interpreted to include past, present, and future tenses; the terms “and” as well as “or” shall be construed either conjunctively or disjunctively, as necessary, to bring within the scope of these requests any DOCUMENTS or information that might otherwise be considered outside their purview.

1           3.       If an objection is made to part or all of any request, the part should be specified  
2 together with the reasons for the objection, and include a sufficient level of particularity to address  
3 the objection, whether it be based on privilege, immunity, or otherwise.

4           4.       If YOU do not have DOCUMENTS or information responsive to ANY or ALL of  
5 the following requests for production, please state so in YOUR response and provide the reason  
6 why such DOCUMENTS cannot be produced.

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LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711

**REQUESTS FOR PRODUCTION**

1  
2 1. DOCUMENTS sufficient to identify the operator(s) and/or owner(s) of the website  
3 <https://www.vSCO.top/>, for which YOU provided network service solutions, including, but not  
4 limited, to pass-through security services, content distribution network, web hosting services,  
5 and/or domain registrar services, including DOCUMENTS sufficient to identify: (1) the name of  
6 the individual owner(s) and/or operator(s) of the website (and, if a corporation or other business  
7 entity, its principals, officers, and employees); (2) the owner and/or operators' last known  
8 address(es); (3) last known telephone number(s); (4) any electronic mail addresses associated with  
9 the account; and (5) any logs of IP addresses used to access the subject account from January 2023  
10 to the present.  
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# EXHIBIT D

1 ERICA BRAND PORTNOY (State Bar No. 244923)

E-Mail: *eportnoy@sideman.com*

2 ANDREW M. LEVAD (State Bar No. 313610)

E-Mail: *alevad@sideman.com*

3 SIDEMAN & BANCROFT LLP

4 One Embarcadero Center, Twenty-Second Floor

San Francisco, California 94111-3711

5 Telephone: (415) 392-1960

6 Facsimile: (415) 392-0827

7 Attorneys for

VISUAL SUPPLY COMPANY

8  
9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12  
13 IN RE: DMCA SECTION 512(h)  
14 SUBPOENA TO (1) CLOUDFLARE,  
15 INC.; (2) PATREON, INC.; and (3)  
16 NAMESILO, L.L.C.

Case No. \_\_\_\_\_

**DECLARATION OF ANDREW M.  
LEVAD IN SUPPORT OF VISUAL  
SUPPLY COMPANY'S REQUEST TO  
THE CLERK FOR ISSUANCE OF  
SUBPOENAS PURSUANT TO SECTION  
512(h) TO IDENTIFY ALLEGED  
INFRINGERS**

LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711



1 I, Andrew M. Levad, declare as follow:

2 1. I am over 18 years of age and make this declaration based upon personal  
3 knowledge of facts set forth below except as to those matters stated on information and belief. As  
4 to those matters, I am informed and believe them to be true. If called upon to testify, I could and  
5 would testify under oath to the matters set forth herein.

6 2. I am an attorney licensed to practice law under the laws of the State of California  
7 and am an associate with the law firm Sideman & Bancroft LLP, attorneys for Visual Supply  
8 Company (“VSCO”) in this matter. This declaration is filed in support of VSCO’s Request To The  
9 Clerk For Issuance Of Subpoenas Pursuant To Section 512(h) To Identify Alleged Infringers (the  
10 “Request”), filed contemporaneously with this declaration.

11 3. Cloudflare, Inc. On July 13, 2023, Sideman & Bancroft LLP attorney Erica Brand  
12 Portnoy utilized Cloudflare, Inc.’s (“Cloudflare”) Reporting Abuse portal to submit six (6)  
13 copyright infringement and DMCA violation abuse reports each to Cloudflare regarding infringing  
14 webpages found on the websites located at <vsco.page> and <glizzy.cafe>. True and correct  
15 copies of Cloudflare’s confirmation emails for these abuse reports are attached hereto as Exhibit  
16 A.

17 4. On January 3, 2024, Ms. Portnoy submitted an abuse report via email, and on  
18 January 10, 2024, Ms. Portnoy utilized Cloudflare’s Reporting Abuse portal to submit six (6)  
19 copyright infringement and DMCA violation abuse reports to Cloudflare regarding <vsco.top>.  
20 True and correct copies of Cloudflare’s confirmation emails for these abuse reports are attached  
21 hereto as Exhibit B.

22 5. On March 15 and 22, 2024, and on April 2 and 9, 2024, I utilized Cloudflare’s  
23 Reporting Abuse portal to submit five (5) copyright infringement and DMCA violation abuse  
24 reports to Cloudflare regarding <downloader.se>. True and correct copies of Cloudflare’s  
25 confirmation emails for each of these abuse reports are attached hereto as Exhibit C.

26 6. In each of these abuse reports, I identified fifty (50) links to infringing content  
27 featured on the website located at the domain <downloader.se> and corresponding links to the  
28 copyrighted content featured on VSCO’s website located at the domain <vsco.co>. To date, I have

1 reported two hundred fifty (250) links of infringing <downloader.se> webpages to Cloudflare. A  
 2 true and correct copy of a chart that displays (1) the links to infringing <downloader.se>  
 3 webpages, (2) links to the corresponding <vsco.co> webpages from which the infringing content  
 4 was copied, and (3) the dates and Report ID numbers of the corresponding Cloudflare abuse  
 5 reports in which I reported these infringements to Cloudflare is attached hereto as Exhibit D.

6 7. **Patreon, Inc.** On July 25, 2023, Ms. Portnoy utilized Patreon Inc.'s ("Patreon")  
 7 Reporting Abuse portal to submit a copyright infringement and DMCA violation abuse report to  
 8 Patreon identifying infringing content posted at <https://www.patreon.com/vscoclub>. True and  
 9 correct copies of Patreon's confirmation email for this abuse report is attached hereto as Exhibit E.

10 8. **NameSilo, L.L.C.** On January 1, 2024, Ms. Portnoy utilized NameSilo, L.L.C.'s  
 11 ("NameSilo") Report Abuse portal to submit a copyright infringement and DMCA violation abuse  
 12 report to NameSilo regarding infringing content on the website <vsco.top>. True and correct  
 13 copies of NameSilo's confirmation email and a screen-capture for the abuse report are attached  
 14 hereto as Exhibit F.

15 9. The purpose for which the accompanying DMCA subpoenas are sought is to obtain  
 16 the identity of an alleged copyright infringer (or infringers) who are the purported owners and/or  
 17 operators of the content identified herein and in the Request and such information will only be  
 18 used for the purpose of protecting VSCO's rights under Title 17 U.S.C. §§ 100, *et seq.*

19  
 20 I declare under penalty of perjury under the laws of the United States of America that the  
 21 foregoing is true and correct, and was executed on June 26, 2024, at San Francisco, California.

22  
 23 By: /s/ Andrew M. Levad  
 24 Andrew M. Levad  
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# EXHIBIT A

**Levad, Andrew M.**

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**From:** Cloudflare <abuse@notify.cloudflare.com>  
**Sent:** Thursday, July 13, 2023 3:20 PM  
**To:** Portnoy, Erica Brand  
**Subject:** [1e0368bdc9e71c74]: Cloudflare has responded to your DMCA copyright infringement complaint

Cloudflare received your DMCA copyright infringement complaint regarding: vsco.page

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare cannot remove material from the Internet that is hosted by others.

Accepted URL(s) on vsco.page:  
<https://vsco.page/>

Hosting Provider:

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Alexhost Srl

Abuse Contact:

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noc@alexhost.com

We have notified our customer of your report.  
We have forwarded your report on to the responsible hosting provider.

You may also direct your report to:

1. The provider where vsco.page is hosted (provided above); 2. The owner listed in the WHOIS record for vsco.page and/or; 3. The contact listed on the vsco.page site.

Note: A lookup of the IP for a Cloudflare customer website will show Cloudflare IPs because we are a pass-through network. The actual website is still hosted at the hosting provider indicated above. If the hosting provider has any questions, please have the hosting provider contact us directly regarding this site. Due to attempted abuse of our complaint reporting process, we will only provide the IP of vsco.page to the responsible hosting provider if they contact us directly at [abusereply@cloudflare.com](mailto:abusereply@cloudflare.com).

Regards,  
Cloudflare Trust & Safety

**Levad, Andrew M.**

---

**From:** Cloudflare <abuse@notify.cloudflare.com>  
**Sent:** Thursday, July 13, 2023 3:25 PM  
**To:** Portnoy, Erica Brand  
**Subject:** [6d5d302a176cfe91]: Cloudflare has responded to your DMCA copyright infringement complaint

Cloudflare received your DMCA copyright infringement complaint regarding: glizzy.cafe

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare cannot remove material from the Internet that is hosted by others.

Accepted URL(s) on glizzy.cafe:  
<https://glizzy.cafe/>

Hosting Provider:

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Hetzner Online GmbH

Abuse Contact:

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abuse@hetzner.de

We have notified our customer of your report.  
We have forwarded your report on to the responsible hosting provider.

You may also direct your report to:

1. The provider where glizzy.cafe is hosted (provided above); 2. The owner listed in the WHOIS record for glizzy.cafe and/or; 3. The contact listed on the glizzy.cafe site.

Note: A lookup of the IP for a Cloudflare customer website will show Cloudflare IPs because we are a pass-through network. The actual website is still hosted at the hosting provider indicated above. If the hosting provider has any questions, please have the hosting provider contact us directly regarding this site. Due to attempted abuse of our complaint reporting process, we will only provide the IP of glizzy.cafe to the responsible hosting provider if they contact us directly at [abuserreply@cloudflare.com](mailto:abuserreply@cloudflare.com).

Regards,  
Cloudflare Trust & Safety

# EXHIBIT B

**Portnoy, Erica Brand**

---

**From:** Portnoy, Erica Brand  
**Sent:** Wednesday, January 3, 2024 11:45 AM  
**To:** 'abuse@cloudflare.com'  
**Subject:** Report of Abuse on behalf of VSCO

**To Cloudflare Abuse team:**

We represent Visual Supply Company ("VSCO"). VSCO has invested substantial effort and resources to prevent misuse of its platform and to protect its user experience and valuable intellectual property.

It has recently come to our attention that an unknown individual or entity has created the website <https://vSCO.top> (the "Website") for which Cloudflare provides pass through service.

The Website displays copyright-protected photos (the "Protected Images") from my client's site without authorization. VSCO, nor its user community, have authorized the Website to post, publish, display, reproduce, use or distribute these images. These photos also appear to be of photographs of women, many of which appear to be minors.

The Protected Images are the intellectual property of individual VSCO creator/users. VSCO's Terms of Use authorizes VSCO to enforce its users' intellectual property rights with regard to their content. Thus, VSCO may submit DMCA notices of infringement to demand the VSCO users' copyrighted content be removed from infringing sites.

Moreover, according to our investigation, the Website is accessing my client's website (vSCO.co) without authorization and using technological measures to bypass certain protections my client has put in place to protect its user's content, namely user images.

The Website has violated my client's terms of service regarding this unauthorized access. And the Website has violated Cloudflare's terms of service, which prohibits content that "Contains, displays, distributes, or encourages the creation of child sexual abuse material, or otherwise exploits or promotes the exploitation of minors; [or] Infringes on intellectual property rights."

VSCO is extremely concerned that the Website is violating its users' rights and posting this content in an inappropriate manner.

This is official notification under Section 512(c) of the Digital Millennium Copyright Act ("DMCA"). **VSCO requests that you cease providing further services to the Website and notify the operator that the content is infringing and must be removed immediately.** VSCO expressly reserves all of its rights in this matter.

Examples of the original and infringing works are listed below.

Original works displayed at:

1. <https://vSCO.co> (Authorized Website)
2. <https://vSCO.co/livfranczyk/gallery>
3. <https://vSCO.co/sophiemahnke/gallery>
4. <https://vSCO.co/ceciliefinnedavidsen/gallery>
5. <https://vSCO.co/auroraadahl/gallery>
6. <https://vSCO.co/meliss-99/gallery>

Corresponding Infringing Works displayed at:

1. <https://vSCO.top> (Unauthorized Website)

2. <https://vSCO.top/profile/livfranczyk/posts/0/>
3. <https://vSCO.top/profile/sophiemahnke/posts/0/>
4. <https://vSCO.top/profile/ceciliefinnedavidsen/posts/0/>
5. <https://vSCO.top/profile/auroraadahl/posts/0/>
6. <https://vSCO.top/profile/meliss-99/posts/0/>

Please reach out if additional information can be provided.

I attest, under penalty of perjury, that I have a good faith belief that use of the material in this report is not authorized by the copyright owner, its agent, or the law; and I am authorized to act on behalf of the copyright owner; AND I understand, under 17 U.S.C. § 512(f), I may be liable for any damages, including costs and attorneys' fees, if I knowingly materially misrepresent reported material.

/s/ Erica Brand Portnoy

**SIDEMAN &  
BANCROFT**

**Erica Brand Portnoy | Partner**

San Francisco, CA  
Main: 415.392.1960  
Direct: 415.733.3953  
[eportnoy@sideman.com](mailto:eportnoy@sideman.com)  
[www.sideman.com](http://www.sideman.com)

**CONFIDENTIALITY**

This e-mail may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply e-mail [or at (415) 392-1960] and delete all copies of this message. It is the recipient's responsibility to scan this e-mail and any attachments for viruses.



## Portnoy, Erica Brand

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**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Wednesday, January 3, 2024 11:12 AM  
**To:** Portnoy, Erica Brand  
**Subject:** [b48744fcaa18e73d] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety

## Portnoy, Erica Brand

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**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Wednesday, January 10, 2024 1:56 PM  
**To:** Portnoy, Erica Brand  
**Subject:** [21514b4b9b8a47af] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety

# EXHIBIT C

**Levad, Andrew M.**

---

**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Friday, March 15, 2024 2:57 PM  
**To:** Levad, Andrew M.  
**Subject:** [1d7371d1afa36b2c] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety

**Levad, Andrew M.**

---

**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Friday, March 22, 2024 4:07 PM  
**To:** Levad, Andrew M.  
**Subject:** [8abc6357b43f72c7] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety

**Levad, Andrew M.**

---

**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Friday, March 22, 2024 4:06 PM  
**To:** Levad, Andrew M.  
**Subject:** [e08abe3aa323c2f3] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety

**Levad, Andrew M.**

---

**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Tuesday, April 2, 2024 1:18 PM  
**To:** Levad, Andrew M.  
**Subject:** [ef68ba7b18e65025] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety

**Levad, Andrew M.**

---

**From:** Cloudflare <noreply@notify.cloudflare.com>  
**Sent:** Tuesday, April 9, 2024 12:23 PM  
**To:** Levad, Andrew M.  
**Subject:** [cf27ced816c88316] Cloudflare: Abuse report confirmation

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,  
Cloudflare Trust & Safety



# EXHIBIT D

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# EXHIBIT E

## Portnoy, Erica Brand

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**From:** Bellamy (Support) <platform-support@patreon.zendesk.com>  
**Sent:** Friday, July 28, 2023 9:39 AM  
**To:** Portnoy, Erica Brand  
**Subject:** [Patreon] Re: Notice of Infringement re patreon.com/vscoclub on behalf of VSCO

## - Please type your reply above this line -##

**PATREON** |



Your request (2185332) has been updated. To add additional comments, reply to this email.



**Bellamy (Patreon)**

Jul 28, 2023, 9:39 AM PDT

Hello there Erica,

I'm Bellamy here at Patreon, thank you for your patience.

The material you identified in your notification of claimed copyright infringement is no longer live on Patreon.

Please don't hesitate to reach out to us in the future if you need further assistance.

Thanks again for helping us keep Patreon a safe and respectful place for creators.

Warm regards,  
Bellamy

Patreon Trust and Safety  
Monday - Friday



**Portnoy, Erica Brand**

Jul 25, 2023, 11:41 AM PDT

Dear Patreon,

We represent Visual Supply Company ("VSCO"). VSCO has invested substantial effort and resources to prevent misuse of its platform and to protect its user experience and valuable intellectual property.

It has recently come to our attention that an unknown individual or entity has created the creator account and website <https://www.patreon.com/vscoclub> (the "Infringing Website") using the Patreon platform. The Infringing Website unlawfully infringes VSCO's trademarks, as detailed below.

VSCO owns numerous United States trademark registrations for the VSCO mark, including, but not limited to U.S. Trademark Reg. Nos. 4,672,062; 4,273,434 and 4,716,756 (the "VSCO Marks"). These federal registrations are valid and registered on the Principal Register of the United States Patent and Trademark Office. VSCO also owns and operates a website at [www.vSCO.CO](http://www.vSCO.CO).

The Infringing Website is using the VSCO Marks in the url (<https://www.patreon.com/vscoclub>), on the account name "VSCO.CLUB" AND "VSCOCLUB," and within the content of site, without VSCO's authorization.

In fact, the Infringing Website is also using the VSCO Marks in connection with the unlawful distribution of the intellectual property (Protected Images) of individual VSCO creator/users. The Infringing Website is accessing my client's website (vSCO.CO) without authorization and using technological measures to bypass certain protections my client has put in place to protect its user's content, and then displaying the Protected Images and facilitating the download of such images in violation of the DMCA's anti-circumvention measures. VSCO, nor its user community, have authorized the Infringing Website to post these images.

Such unauthorized use of the VSCO Marks constitutes trademark infringement under U.S. Federal Law, including Sections 43(a) and (c) of the Lanham Act.

The Infringing Website has violated my client's terms of service and the Infringing Website has also violated Patreon's terms of service, which prohibits a Creator from making available creations or otherwise make posts on Patreon that infringe others' intellectual property or proprietary rights.

**VSCO requests that you cease providing further services to the Infringing Website and notify the Infringing Website that the use of the VSCO Marks is infringing.**

Best regards,  
Erica Brand Portnoy

**SIDEMAN &  
BANCROFT**

**Erica Brand Portnoy | Partner**

San Francisco, CA  
Main: 415.392.1960  
Direct: 415.733.3953  
[eportnoy@sideman.com](mailto:eportnoy@sideman.com)  
[www.sideman.com](http://www.sideman.com)

**CONFIDENTIALITY**

This e-mail may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply e-mail [or at (415) 392-1960] and delete all copies of this message. It is the recipient's responsibility to scan this e-mail and any attachments for viruses.

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To unsubscribe from this group and stop receiving emails from it, send an email to [copyright+unsubscribe@patreon.com](mailto:copyright+unsubscribe@patreon.com).

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Be a part of the Community: [Blog](#) | [FAQ](#)

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You have been sent this message because you recently opened a help request with the Patreon Community Happiness Team.

# EXHIBIT F

## Levad, Andrew M.

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**From:** NameSilo Abuse Team <abuse@namesiloabuse.freshdesk.com>  
**Sent:** Wednesday, January 3, 2024 9:05 PM  
**To:** Portnoy, Erica Brand  
**Cc:** abuse@namesilo.com  
**Subject:** Re: # 31959757 NameSilo Abuse Form

Hi,

Thank you for reporting this issue.

Please note we are only the domain name registrar and cannot validate or control the content posted on the site.

If you or your client are the holder of a trademark that you feel is being infringed upon via a domain name registered with us, you are advised to consider a UDRP dispute.

We will comply as required by ICANN rules upon the commencement of a UDRP dispute.

Main UDRP Bodies:

- \*National Arbitration Forum - adrforum.com.
- \*World Intellectual Property Organization (WIPO) - wipo.int
- \*Asian Domain Dispute Resolution Centre (ADR) - adndrc.org

Czech Arbitration Court (CAC) - adr.eu

Resolution Canada - resolutioncanada.ca

If you are a copyright holder and believe your rights are being infringed, we recommend you file a DMCA complaint with the hosting provider of the associated web site. <https://www.whoishostingthis.com/resources/dmca/>

If you want to report a phishing case, please follow these steps:

To create a case:

- 1) Visit new(.)namesilo(.)com/phishing\_report(.)php
- 2) Fill in a the domain URL
- 3) Complete required information and click Continue.

To report SPAM/SCAM please contact the hosting provider:

This can be done by the hosting company of the website, which you can look up on this website:

<https://www.whoishostingthis.com/>

Once you know the hosting provider, please look up their company information and contact them with the case.

To report SPAM/SCAM please contact the hosting provider:

This can be done by the hosting company of the website, which you can look up on this website:

<https://www.whoishostingthis.com/>

Once you know the hosting provider, please look up their company information and contact them with the case.

You can also use the following pages to report the website:

Malware: [https://safebrowsing.google.com/safebrowsing/report\\_badware/](https://safebrowsing.google.com/safebrowsing/report_badware/)

Scam and Fraud: <https://secure.ncfirms.org/nficweb/OnlineComplaintForm.aspx>

Whois inaccuracy you may report here: <https://forms.icann.org/en/resources/compliance/complaints/whois/inaccuracy-form>

You may also discuss the case with your local law enforcement officer to seek help.

To limit the number of spam landing in your mailbox please follow these instructions:

Check your email account to see if it provides a tool to filter out potential spam or to channel spam into a bulk email folder. You might want to consider these options when you are choosing which Internet Service Provider (ISP) or email service to use.

Limit your exposure. You might decide to use two email addresses one for personal messages and one for shopping, newsletters, chat rooms, coupons and other services. You also might consider using a disposable email address service that forwards messages to your permanent account. If one of the disposable addresses begins to receive spam, you can shut it off without affecting your permanent address.

Also, try not to display your email address in public. That includes on blog posts, in chat rooms, on social networking sites, or in online membership directories. Spammers use the web to harvest email addresses.

Check privacy policies and uncheck boxes. Check the privacy policy before you submit your email address to a website. See if it allows the company to sell your email to others. You might decide not to submit your email address to websites that will not protect it.

When submitting your email address to a website, look for pre-checked boxes that sign you up for email updates from the company and its partners. Some websites allow you to opt out of receiving these mass emails.

Choose a unique email address. Your choice of email addresses may affect the amount of spam you receive. Spammers send out millions of messages to probable name combinations at large ISPs and email services, hoping to find a valid address. Thus, a common name such as jdoe may get more spam than a more unique name like j26d0e34. Of course, there is a downside it is harder to remember an unusual email address.

Hackers and spammers troll the internet looking for computers that are not protected by up to date security software. When they find unprotected computers, they try to install hidden software called malware that allows them to control the computers remotely. Many thousands of these computers linked together make up a botnet, a network used by spammers to send millions of emails at once. Millions of home computers are part of botnets. In fact, most spam is sent this way.

Do not let spammers use your computer. You can help reduce the chances that your computer will become part of a botnet. Use good computer security practices and disconnect from the internet when you are away from your computer. Hackers can not get to your computer when it is not connected to the internet. Be cautious about opening any attachments or downloading files from emails you receive. Do not open an email attachment even if it looks like it is from a friend or coworker, unless you are expecting it or you know what it is. If you send an email with an attached file, include a message explaining what it is.

Download free software only from sites you know and trust. It can be appealing to download free software like games, file sharing programs, and customized toolbars. But remember that free software programs may contain malware.

Report Spam to the Federal Trade Commission at [spam@uce.gov](mailto:spam@uce.gov) and at <https://www.spamcop.net/anonsignup.shtml>

Read more about reporting spam on this page: [https://en.wikipedia.org/wiki/Spam\\_reporting](https://en.wikipedia.org/wiki/Spam_reporting)

Hope you find this helpful!

NameSilo Abuse Team



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[home](#)

[register](#)

[transfer](#)

[hosting](#)

[marketplace](#)

[pricing](#)

[API](#)

[why us?](#)

[support](#)

## Report Abuse

Your abuse report has been received. We will follow up shortly.

You may also contact us via [abuse@namesilo.com](mailto:abuse@namesilo.com), but the above form is the proper way to submit abuse reports.

### Why choose NameSilo?



cheap



easy



secure



tools



**Got Questions?  
Need Help?**

[Click here to chat with support now!](#)

Learn more about  
**namesilo**  
domains. cheap, easy and secure.



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# EXHIBIT E

# SIDEMAN & BANCROFT

One Embarcadero Center, Twenty-Second Floor  
San Francisco, California 94111-3711  
Telephone: (415) 392-1960  
Facsimile: (415) 392-0827

Erica Brand Portnoy  
eportnoy@sideman.com

June 26, 2024

Mark B. Busby  
Office of the Clerk  
United States District Court  
Northern District of California  
450 Golden Gate Avenue  
San Francisco, CA 94102-3489

**Re: Application for DMCA Subpoenas to Service Providers**

Dear Mr. Busby:

On behalf of our client VISUAL SUPPLY COMPANY (“VSCO”), we respectfully request that the Clerk issue subpoenas pursuant to 17 U.S.C. § 512(h) to Cloudflare, Inc. (“Cloudflare”), Patreon, Inc. (“Patreon”) and NameSilo, L.L.C. (“NameSilo”) (collectively, the “Service Providers”) via their registered agents and/or principal places of business located at the following addresses:

Cloudflare.: c/o Registered Agent Solutions, Inc., 720 14<sup>th</sup> Street, Sacramento, CA 95814;

Patreon.: c/o Incorporating Services, Ltd., 7801 Folsom Blvd #202, Sacramento, CA 95826;

NameSilo.: c/o Incorp Services, Inc., 8825 N. 23<sup>rd</sup> Ave., Suite 100, Phoenix, AZ 85021.

Section 512(h) of the Digital Millennium Copyright Act provides that a “copyright owner or a person authorized to act on the owner’s behalf may request the clerk of any United States district court to issue a subpoena to a service provider for identification of an alleged infringer in accordance with this subsection.” 17 U.S.C. § 512(h)(1). For a subpoena to be issued, Section 512(h) requires the filing with the Clerk of the Court of:

- (1) a copy of a notification of claimed infringement required by Section 512(c)(3)(A);
- (2) a proposed subpoena; and

June 25, 2024

Page 2

- (3) a sworn declaration that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under U.S.C. Title 17.

Enclosed for filing is VSCO's Request to The Clerk For Issuance of Subpoenas Pursuant To 17 U.S.C. § 512(h) To Identify Alleged Infringers, which includes copies of the notifications of claimed infringement to each of the Service Providers, proposed subpoenas to each of the Service Providers, and a sworn declaration.

We respectfully request that subpoenas be issued expeditiously by the Clerk of the Court and returned to the undersigned for service on the subpoena recipients.

Thank you for your prompt attention to this matter.

DATED: June 26, 2024

Respectfully submitted,

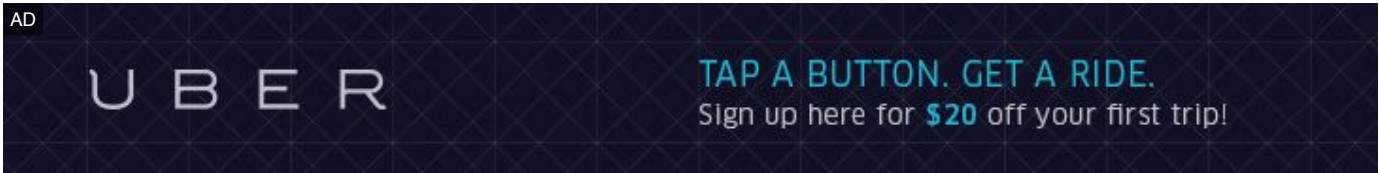
By: /s/ Andrew M. Levad

Andrew M. Levad

SIDEMAN & BANCROFT LLP

Attorneys for Visual Supply Company

# EXHIBIT F



## IP Address Lookup

### IP Location Finder

IPv4, IPv6 or Domain Name

IP Lookup

Enter a IPv4, IPv6 or Domain name into the input box above, and we'll locate its IP location.

184.147.76.101

Hide this IP Address

Here are the results from a few Geolocation providers. Is the data shown below not accurate enough? Please read [geolocation accuracy](#) info to learn why.

Do you have a problem with IP location lookup? Report a [problem](#).

Geolocation data from **IP2Location** Product: DB6, 2025-3-1

<b>IP ADDRESS:</b> 184.147.76.101	<b>ISP:</b> Bell Canada
<b>COUNTRY:</b> Canada	<b>ORGANIZATION:</b> Not available
<b>REGION:</b> Ontario	<b>LATITUDE:</b> 42.0381
<b>CITY:</b> Kingsville	<b>LONGITUDE:</b> -82.7423

Incorrect location?

[Contact IP2Location](#)

[view map](#)

Geolocation data from **ipinfo.io** Product: API, real-time

<b>IP ADDRESS:</b> 184.147.76.101	<b>ISP:</b> Not available
<b>COUNTRY:</b> Canada	<b>ORGANIZATION:</b> AS577 Bell Canada
<b>REGION:</b> Ontario	<b>LATITUDE:</b> 42.0501
<b>CITY:</b> Leamington	<b>LONGITUDE:</b> -82.5998

Incorrect location?

[Contact ipinfo.io](#)

[view map](#)

Geolocation data from **DB-IP** Product: API, real-time



### Security Tools

- DNS Lookup
- Search a Person
- Inspect suspicious links
- Data Breach Check

### Popular Articles

- What is an IP Address?
- RJ45 Cable Wiring: T-568-B Straight-through & Crossover RJ-45 cabling
- How to track your lost smartphone with an IP address?
- How to defend Wordpress from DDoS attacks?
- What is Cybersecurity?


### Advertisement



### IP Address Articles


March 1, 2016


[How to hide my IP address?](#)


There are several ways to hide your IP address, and your geolocation. Hiding your IP address is concealing your "true" IP address with a different one. You may use a VPN, Proxy or Anonymous Browser to hide your IP address.


**IP ADDRESS:** 184.147.76.101


**COUNTRY:** Canada 


**REGION:** Ontario

**CITY:** Kingsville

**ISP:** Bell Canada

**ORGANIZATION:** Sympatico HSE

**LATITUDE:** 42.0403

**LONGITUDE:** -82.7392

[Incorrect location?](#)

[Contact DB-IP](#)

 [view map](#)

AD

**GAIAMTV**  
TRANSFORMATION NETWORK

VIDEO STREAMING FOR THE AWAKENED M



GET STARTED NOW


**Geolocation data from**


**IPregistry.co**


Product: API, real-time


**IP ADDRESS:** 184.147.76.101


**COUNTRY:** Canada 


**REGION:** Ontario

**CITY:** Kingsville

**ISP:** Bell Canada

**ORGANIZATION:** Sympatico Hse

**LATITUDE:** 42.04685

**LONGITUDE:** -82.75913

[Incorrect location?](#)


[Contact IPregistry.co](#)



 [view map](#)


**Geolocation data from**


**IPGeolocation.io**


Product: API, real-time


**IP ADDRESS:** 184.147.76.101


**COUNTRY:** Canada 


**REGION:** Ontario

**CITY:** Amherstburg

**ISP:** Sympatico HSE

**ORGANIZATION:** Bell Canada

**LATITUDE:** 42.03787

**LONGITUDE:** -82.73964

[Incorrect location?](#)


[Contact IPGeolocation.io](#)



 [view map](#)


**Geolocation data from**


**IPapi.co**


Product: API, real-time


**IP ADDRESS:** 184.147.76.101


**COUNTRY:** Canada 


**REGION:** Ontario

**CITY:** Kingsville

**ISP:** BACOM

**ORGANIZATION:** BACOM

**LATITUDE:** 42.0463

**LONGITUDE:** -82.7587

[Incorrect location?](#)


[Contact IPapi.co](#)



 [view map](#)


**Geolocation data from**


**ipbase.com**


Product: API, real-time


**IP ADDRESS:** 184.147.76.101


**COUNTRY:** Canada 


**REGION:** Ontario

**CITY:** Kingsville

**ISP:** Bell Canada

**ORGANIZATION:** Bell Canada

**LATITUDE:** 42.0381

**LONGITUDE:** -82.7423

[Incorrect location?](#)

[Contact ipbase.com](#)

 [view map](#)

**Geolocation data from**

**criminalip.io**

Product: API, real-time

**IP ADDRESS:** 184.147.76.101

**COUNTRY:** Canada 

**REGION:** Ontario

**CITY:** Kingsville

**ISP:** Not available

**ORGANIZATION:** Bell Canada

**LATITUDE:** 42.0463

**LONGITUDE:** -82.7587

[Learn more >](#)

**Old IP Address**  
192.168.1.102

**New IP Address**  
192.168.1.101

Change your IP Address

April 14, 2016

[How to change your IP address?](#)

Would you like to change the IP address of your computer, smartphone or tablet? You're getting your IP address from your Internet Service Provider, and you have the right to obtain a new IP address whenever you desire. Let us show you how you can change an IP address of your device.

[Learn more >](#)

**PRIVATE IP ADDRESS**

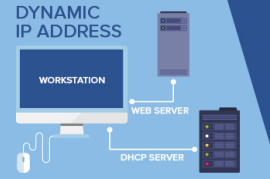
**PUBLIC IP ADDRESS**

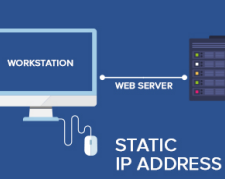
February 15, 2012

[What is the difference between public and private IP address?](#)

A public IP address is an IP address that can be accessed over the Internet, and a private IP address is an IP address that is local to your private network. A public IP is a globally unique IP, while a private IP address can be reused in different networks.

[Learn more >](#)

**DYNAMIC IP ADDRESS**

**STATIC IP ADDRESS**

October 7, 2012

[What is the difference between a static and dynamic IP address?](#)

An IP address is an address assigned to a device on the Internet. A static IP address is a fixed IP address that never changes, and a dynamic IP address is an IP that is assigned by the DHCP server which may change over time.

[Learn more >](#)



Incorrect location?[Contact criminalip.io](#)

view map

Geolocation data from

ipapi.is

Product: API, real-time

IP ADDRESS: 184.147.76.101


ISP: Bell Canada

COUNTRY: Canada 

ORGANIZATION: Bell Canada

REGION: Ontario

LATITUDE: 42.0381

CITY: Kingsville

LONGITUDE: -82.7423

Incorrect location?[Contact ipapi.is](#)

view map

Would you like to help us improve ip-to-location data by providing a [geofeed](#) or custom feedback?

Login to add feedback

### Trivia Question

What markup language is used to structure content on the web?

- ☐ HTML
- ☐ XML
- ☐ CSS
- ☐ JavaScript

### IP-Based Geolocation Accuracy

The Geolocation lookup tool provided on this page is an estimate of where the IP address may be located. The data come from a few IP-Based Geolocation providers, and their accuracy varies depending on how quickly they update their database when changes occur. Since many Internet users are getting their dynamic IP address from their [ISP](#), and most ISPs serve their customers in multiple regions causing Geolocation lookup to be accurate to the region they serve. For example, AT&T in the United States serve their customers in entire USA and the accuracy may be limited to the Country level. Other ISPs may be serving smaller areas, and some ISPs create subnetworks to serve their customers in smaller regions. For this reason, the IP-based Geolocation will be about 99% accurate at the country level while the accuracy of State and City may be at much less accurate level somewhere around 50% range.

For more information about Geolocation Accuracy, please read [How accurate is IP-based Geolocation lookup?](#)

### Related Articles

- [What is an IP Address?](#)
- [My IP Address is Hacked. What can I do?](#)
- [What is the difference between static and dynamic IP Address?](#)
- [What is the difference between public and private IP Address?](#)

AD

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### Blog Categories

- ▶ Artificial Intelligence (100)
- ▶ Automotive (25)
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  - ▶ Ecommerce (93)
  - ▶ Intellectual Property (13)
  - ▶ Productivity (23)
- ▶ Cloud Services (97)
- ▶ Computing (60)
- ▶ Crypto & Blockchain (48)
- ▶ Cybersecurity (296)
  - ▶ Distributed Denial of Service (10)
  - ▶ Password (22)
  - ▶ Safety (31)
- ▶ Data & Database (27)
- ▶ Digital Marketing (142)
- ▶ Education (54)
- ▶ Email (84)
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- ▶ Lifestyle (53)
  - ▶ Parenting (2)
- ▶ Network (104)
- ▶ Online Resources (22)
- ▶ Online Tools (105)
- ▶ Privacy (159)
  - ▶ Virtual Private Network (92)

- Proxy (65)
- Real Estate (15)
- Scams & Frauds (19)
- Security (10)
- Smartphone (52)
- Social Media (87)
  - Social Media Marketing (39)
- Software (210)
  - Software Development (160)
  - Software Testing (17)
  - Mobile App Development (19)
  - Web Development (14)
- Technology (81)
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  - Search Engine Optimization (83)
  - Web Hosting (35)
  - Web Design (24)

About Us



Welcome to IP Location, the home of IP Geolocation, security and privacy resources. This website was built to offer tips, tutorials and articles on IP address, VPN, Proxy, DDoS and WebAuthn technologies.

Popular Topics

- > VPN
- > Proxy
- > Web Hosting
- > SEO
- > Product Reviews
- > Password

Company Info

- > Terms of Service
- > Privacy Policy
- > Advertise With Us
- > Guest Posting
- > Contact Us
- > Login / Signup

Socialize

Subscribe to our newsletter:

Like Us on Facebook

Twitter on Twitter

LinkedIn on LinkedIn

Instagram on Instagram

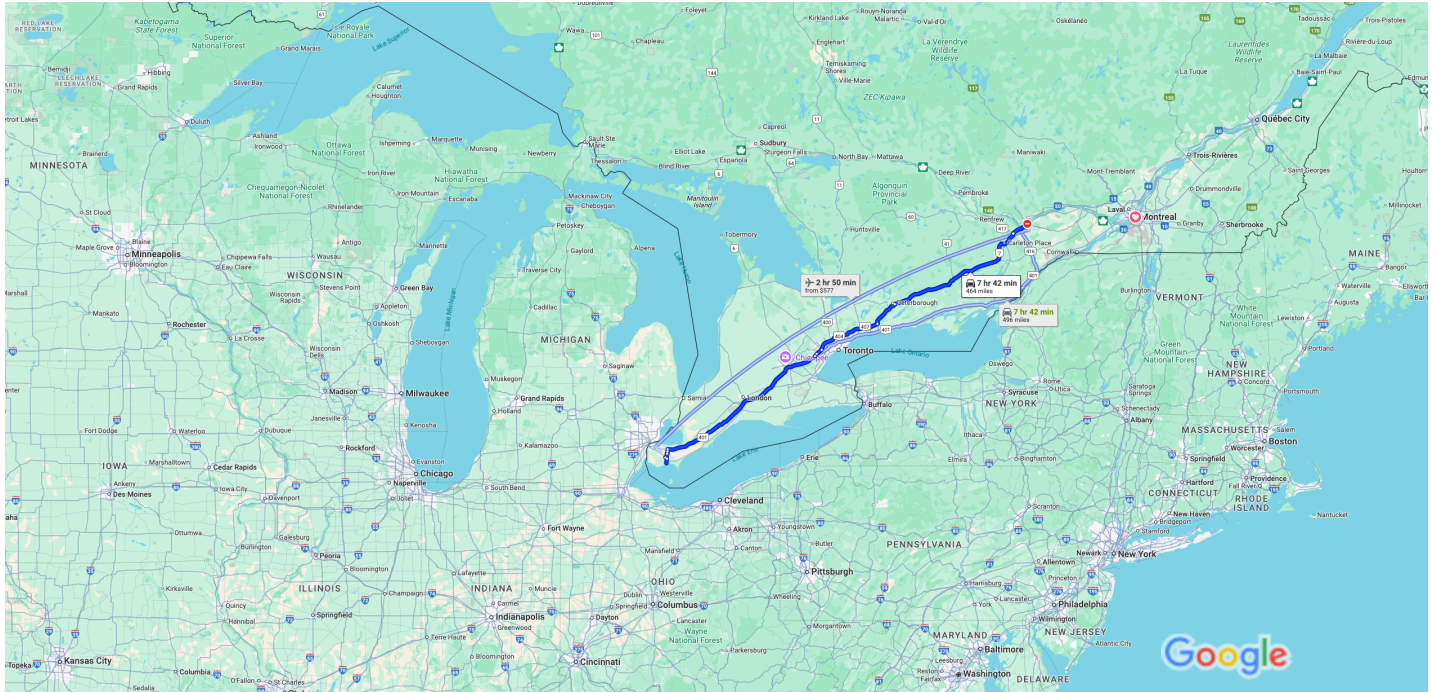


# EXHIBIT G



Ottawa, Ontario to Kingsville, Ontario

Drive 464 miles, 7 hr 42 min



Map data ©2025 Google

100 km



via Hwy 7 and ON-401 W

7 hr 42 min

Best route now, avoids road closures on ON-417 W

464 miles



This route has tolls.



via ON-401 W

7 hr 42 min

496 miles



Ottawa, ON—Windsor, ON

2 hr 50 min

from CA\$577

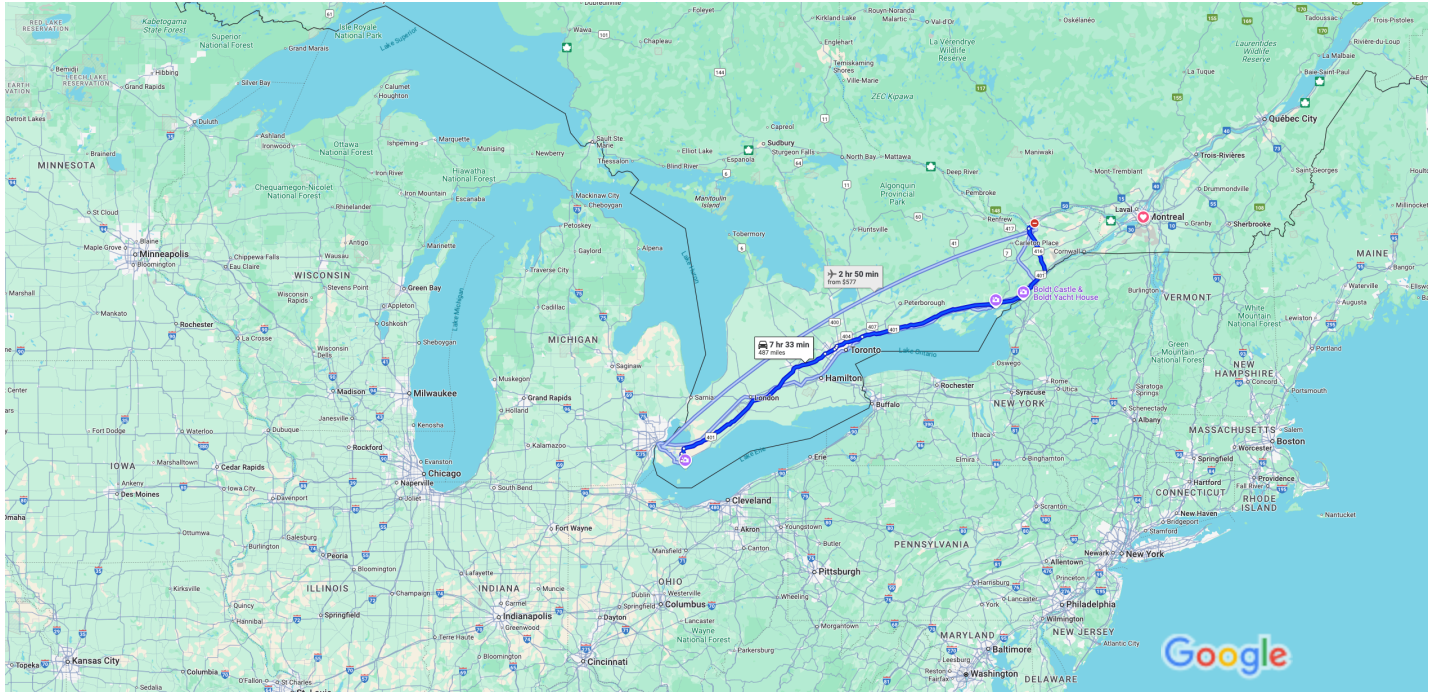
Explore new places along this route

Add suggested stops

# EXHIBIT H



Ottawa, Ontario to Leamington, Ontario Drive 487 miles, 7 hr 33 min



Map data ©2025 Google

100 km



via ON-401 W

7 hr 33 min

Fastest route now, avoids road closures on ON-417 W

487 miles



5:21AM (Friday)—6:47 PM

13 hr 26 min

VIA Rail > VIA Rail > 2 > 115 > 42 >



Ottawa, ON—Windsor, ON

2 hr 50 min

from CA\$577

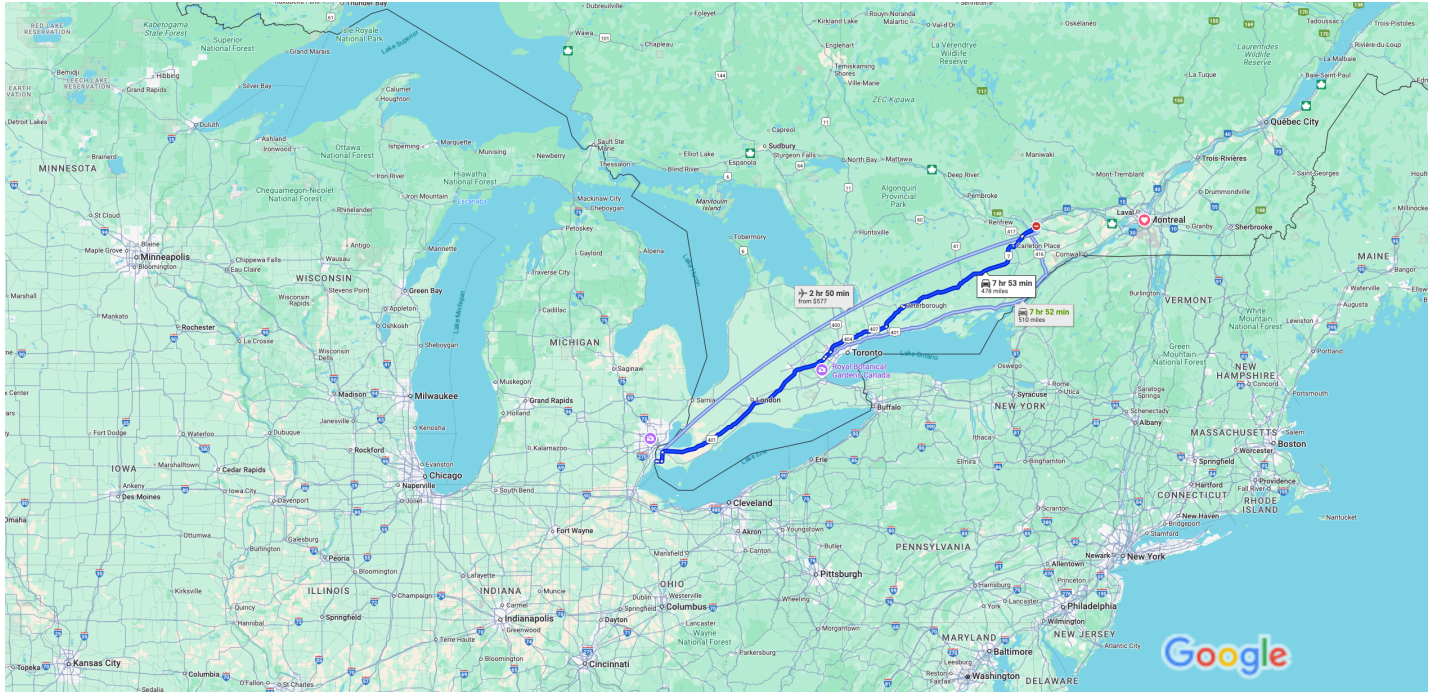
Explore new places along this route

Add suggested stops

# EXHIBIT I



Ottawa, Ontario to Amherstburg, Ontario Drive 478 miles, 7 hr 53 min



Map data ©2025 Google

100 km



via Hwy 7 and ON-401 W

7 hr 53 min

Best route now, avoids road closures on ON-417 W

478 miles



This route has tolls.



via ON-401 W

7 hr 52 min

510 miles



Ottawa, ON—Windsor, ON

2 hr 50 min

from CA\$577

Explore new places along this route

Add suggested stops

# EXHIBIT J





**Evolink Law Group**  
4388 Still Creek Drive, Suite 237  
Burnaby, BC V5C 6C6

p. 604 620 2666  
info@evolinklaw.com  
www.evolinklaw.com

March 13, 2025

**VIA EMAIL**

SIDEMAN & BANCROFT LLP

**ATTN: Mr. Zachary J. Alinder**

One Embarcadero Center, Twenty-Second Floor  
San Francisco, California 94111-3711

Dear Mr. Alinder,

**RE: Visual Supply Company v. Khimji, et al (N.D. Cal: 3:24-cv-09361-WHO)**

---

We write regarding two topics relating to the aforementioned file: (a) continuation of the March 25, 2025 initial case management conference; and (b) documents relating to the WIPO proceedings referred to in the Complaint.

**Continuation of the March 25, 2025 Initial Case Management Conference**

Further to our email exchanges, we understand that the Plaintiff is agreeable to continue the March 25, 2025 Initial Case Management Conference to a mutually convenient date. We enclose a draft Stipulation and Proposed Order to that effect, including a draft declaration in support thereof.

We have reviewed the Court's calendar and the Certificate of Unavailability found here (<https://apps.cand.uscourts.gov/CEO/cfd.aspx?7147>). The earliest available Tuesday that I can be available, taking into account the Court's availability, is June 17, 2025.

Please let us know at your earliest convenience if you are available on June 17, 2025.

**Documents Relating to the WIPO Proceedings Referred to in the Complaint**

At paragraphs 37 and 38, the Plaintiff pleads and makes reference to two WIPO UDRP proceedings: *Visual Supply Company* ("VSCO") v. *Nice IT Services Group Inc., Customer Domain Admin and Aiden Salamon*, WIPO Case No. D2023-3616 (Oct. 20, 2023) and *Visual Supply Company* ("VSCO") v. *Nice IT Services Group Inc., Customer Domain Admin*, WIPO Case No. D2024-0621 (Apr. 3, 2024). We understand your office represented VSCO on both of these WIPO UDRP proceedings.





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4388 Still Creek Drive, Suite 237  
Burnaby, BC V5C 6C6

p. 604 620 2666  
info@evolinklaw.com  
www.evolinklaw.com

Please advise if the Plaintiff is willing to provide copies of the following documents from the two aforementioned WIPO matters by **March 18, 2025**:

1. For *Visual Supply Company ("VSCO") v. Nice IT Services Group Inc., Customer Domain Admin and Aiden Salamon*, WIPO Case No. D2023-3616 (Oct. 20, 2023):
  - a. The original complaint filed by VSCO on August 29, 2023.
  - b. The emails sent by the Center to VSCO on September 1, 2023 regarding the contact information disclosed by the domain name registrars.
  - c. The amended complaint filed by VSCO on September 6, 2023.
  - d. The email communications sent by Aiden Salamon to the Center on September 7 and 14, 2023.
2. For *Visual Supply Company ("VSCO") v. Nice IT Services Group Inc., Customer Domain Admin*, WIPO Case No. D2024-0621 (Apr. 3, 2024):
  - a. The original complaint filed by VSCO on February 10, 2024.
  - b. The emails sent by the Center to VSCO on February 14, 2024 regarding the contact information disclosed by the domain name registrars.
  - c. The amended complaint filed by VSCO on February 17, 2024.

If the Plaintiff is unwilling to provide the aforementioned documents, we may not be able to conduct the necessary reviews and investigations before filing an answer. As such, we would necessarily need to seek the Court's intervention, which may affect the timelines.

We trust that the Plaintiff will provide the aforementioned documents without delay.

Yours truly,

**EVOLINK LAW GROUP**

  
SIMON LIN

Barrister & Solicitor (Ontario and British Columbia, Canada)  
Attorney (California, USA)

Encls: (1) Stipulation to Continue March 25, 2025 Initial CMC; and (2) Declaration of Simon Lin in support.

# EXHIBIT K



Simon Lin <simonlin@evolinklaw.com>

---

**VSCO v. Khimji, et al. (N.D. Cal: 3:24-cv-09361-WHO)**

---

**Alinder, Zachary J.** <zalinder@sideman.com>  
To: Simon Lin <simonlin@evolinklaw.com>

Fri, Mar 14, 2025 at 1:58 PM

Dear Mr. Lin:

I am generally fine with the proposed stipulation. The date of June 17, 2025 seems very far out. For example, I would be available the following Tuesday on April 1<sup>st</sup> or April 8<sup>th</sup>. If you really cannot do another Tuesday before June 17<sup>th</sup>, I think you both will need to set that out in the stipulation and in your declaration to make it clear that your conflicts are what prevent an earlier date. Please re-circulate either with one of the April dates, or if you really cannot make an earlier date work before May when Judge Orrick is out, with sufficient detail to support that request.

On the discovery, as you know, there is a standard process to follow. And, to that end, we've previously asked for a lot of information from Mr. Khimji through prior counsel that we never received. That said, I am sure we can arrange for the Rule 26(f) conference at a mutually convenient date/time in the near future, so both sides can begin discovery here.

Best,

Zac

[Quoted text hidden]

# EXHIBIT L



Simon Lin &lt;simonlin@evolinklaw.com&gt;

**VSCO v. Khimji, et al. (N.D. Cal: 3:24-cv-09361-WHO)**

Simon Lin &lt;simonlin@evolinklaw.com&gt;

Fri, Mar 14, 2025 at 3:13 PM

To: "Alinder, Zachary J." &lt;zalinder@sideman.com&gt;

Dear Mr. Alinder,

I appreciate that June 17, 2025 is not as soon as the Plaintiff would hope for. Unfortunately, my calendar for April and May are fully packed, as I have detailed in the revised draft declaration and stipulation. If your concern is that I am making myself unavailable in order to delay matters, I can assure you that is not the case. Mr. Khimji similarly wants to get to the bottom of this as soon as possible. Please let us know if there are any further comments with the proposed stipulation.

I have reviewed the back and forth you had with Mr. Khimji's prior counsel, who appears not to have any experience in California or USA law, or tech related issues. What information, specifically, are you requesting from Mr. Khimji that your client is saying he failed to provide?

I am familiar with the standard process. My letter below was a request to ascertain if the Plaintiff is willing to cooperate, considering those WIPO cases are explicitly pleaded and the Plaintiff seems to be relying on them to advance their case anyways. In my experience, parties are often able to deal with similar requests without having to litigate everything. We trust that your client will reconsider their position and get back to us next Tuesday.

Finally, I understand you have shared the enclosed vsco.club CSV file with Mr. Khimji's former counsel. On a cursory review using IP Geolocations, the IP address in that Excel file (i.e., 184.147.76.101) seems to be a Bell Canada residential user in Leamington or Kingsville, Ontario. Both Leamington and Kingsville are approximately 800km away from Ottawa, where Mr. Khimji resides. In my experience, it would seem unusual for the physical location for an IP address to be hundreds of kilometers away from the user. **Has the Plaintiff approached the Canadian ISP to obtain the account holder information for the IP address in the CSV file?** The ISP's records may be much more reliable than information in the records of internet companies. For internet companies, almost any name can be entered as long as the person making the entry has their hands on the particular name.

Thank you.

Kind Regards,

Simon Lin  
Barrister & Solicitor

**Evolink Law Group**

237-4388 Still Creek Drive, Burnaby, B.C. V5C 6C6

T: 604-620-2666

F: 778-805-9830

[www.evolinklaw.com](http://www.evolinklaw.com)

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[Quoted text hidden]

**3 attachments****Stipulation for Continue CMC.docx**

38K

**Declaration of Simon Lin.docx**

38K

**vsco.club - Adam Khimji Payment Confirmation- Accounts.csv**

1K

# EXHIBIT M



Simon Lin <simonlin@evolinklaw.com>

---

**VSCO v. Khimji, et al. (N.D. Cal: 3:24-cv-09361-WHO)**

---

**Alinder, Zachary J.** <zalinder@sideman.com>

Fri, Mar 14, 2025 at 3:24 PM

To: Simon Lin <simonlin@evolinklaw.com>

Dear Mr. Lin:

Understood. Thank you for providing the additional detail. I did not believe you were seeking delay for improper reasons, but I do think that the stipulation is more likely to get your intended result by explaining the basis, as you have done. Assuming no other substantive changes are made, this stipulation is fine on my end, and you are authorized to apply an /s/ Zachary Alinder e-signature and e-file.

As for the discovery issues, I'll discuss further with VSCO, but I am inclined to simply schedule a Rule 26(f) conference so that discovery can simply be open. In particular, we need further discovery to identify the other co-conspirators. Mr. Khimji – through counsel – refused to identify the owners/operators of the other sites identified in the Complaint, and assuming that is still the case, we'll likely need to issue subpoenas to get to the bottom of that. We'll also of course have to agree on a date for exchange of initial disclosures.

[Quoted text hidden]

# EXHIBIT N





Simon Lin <simonlin@evolinklaw.com>

---

**VSCO v. Khimji, et al. (N.D. Cal: 3:24-cv-09361-WHO)**

---

Simon Lin <simonlin@evolinklaw.com>

Fri, Mar 14, 2025 at 3:47 PM

To: "Alinder, Zachary J." <zalinder@sideman.com>

Dear Mr. Alinder,

Thank you for the prompt reply. I will submit the materials for filing unchanged.

Can you please point me to the correspondences where you say Mr. Khimji "*refused to identify the owners/operators of the other sites identified in the Complaint*"? The manner Mr. Kleiman handling this file leaves much to be desired, and he is no longer involved. I trust that my involvement here could bring a fresh perspective.

Thank you for agreeing to speak with your client about the exchange of information. The reason I ask about the IP address is, it appears from the exchanges that the Plaintiff may have overlooked the possibility that a third-party may have utilized Mr. Khimji's name without permission. It would seem to make little sense for someone to use a Protonmail email account (which is regarded as highly anonymous) only to then use their real name with an internet company such as Cloudflare.

Considering your office first contacted Mr. Khimji through his work email, we trust that you are aware that he works for the Government of Canada as a Policy Analyst on economics policy. He does not have a technology background as far as I am aware. The level of sophistication of what the Plaintiff is alleging seems to be far from what an individual with Mr. Khimji's background is capable of.

Thank you.

Kind Regards,

**Simon Lin**  
Barrister & Solicitor



**Evolink Law Group**  
237-4388 Still Creek Drive, Burnaby, B.C. V5C 6C6  
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